

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

REGIS B. BINGHAM

CHAPTER 13

CASE NO. 4 - 11 -bk- 04025-JJT

Debtor(s)

CHARLES J. DEHART, III
CHAPTER 13 TRUSTEE

ADVERSARY NO. - ap-
(if applicable)

Plaintiff(s)/Movant(s)

vs.

REGIS B. BINGHAM

Nature of Proceeding: Motion to Dismiss

Defendant(s)/Respondent(s)

Document #: 90

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Counsel for Debtor is working on the necessary paperwork to finalize this case. Additionally, Counsel for Debtor is scheduled, pursuant to his obligation as Title IV-D Attorney for Union County Domestic Relations, to be in Family Court from 9:00am-5:00pm on the same date as this hearing.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: August 24, 2016

/s/ Brian L. Kerstetter, Esquire

Attorney for Regis B. Bingham

Name: Brian L. Kerstetter, Esquire

Phone Number: 570-524-6020

¹ No alterations or interlineations of this document are permitted.